



**John W. McGuinness**  
Manatt, Phelps & Phillips, LLP  
Direct Dial: (202) 585-6540  
JMcGuinness@manatt.com

July 24, 2025

**VIA CM/ECF DOCKET**

Hon. Paul A. Engelmayer  
U.S. District Court for the Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***Wilson v. Better Mortgage Corp.*, Case No. 1:25-cv-05503 (S.D.N.Y.)**  
**Unopposed Request for Extension of Time for Defendant to Answer, Move, or**  
**Otherwise Respond to Plaintiff's Complaint**

Dear Judge Engelmayer:

Our firm represents Defendant Better Mortgage Corp. ("Defendant") in the above-referenced matter. Pursuant to Rule 1.E. of Your Honor's Individual Rules and Practices in Civil Cases, Defendant respectfully submits this unopposed letter motion requesting an extension of time of thirty (30) days, to and including August 28, 2025, of Defendant's deadline to answer, move, or otherwise respond to Plaintiff's Complaint (ECF 1, the "Complaint"). In support thereof, Defendant respectfully states the following:

1. The Complaint was filed on July 2, 2025, 2025. *See* ECF 1. Plaintiff's proof of service indicates that Defendant was purportedly served with process on July 8, 2025 and, therefore, Defendant's current responsive pleading deadline is on July 29, 2025. *See* ECF 6.

2. Defendant seeks an extension of the foregoing deadline because Defendant recently retained suitable litigation counsel, who require additional time to adequately investigate Plaintiff's claims, prepare appropriate responsive pleading(s), and (if appropriate) explore a possible early extra-judicial resolution with Plaintiff, which may obviate the need for Defendant to respond altogether if successful. Defendant's counsel also require additional time due to various professional and personal conflicts with the current pleading deadline above. Thus, the requested extension is for good cause, is not made for the purpose of delay, will not impact the timely resolution of this matter, will not result in any prejudice, and will promote judicial and party economy.

3. Defendant has not made a previous request for an extension of said deadline.

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4. On July 14, 2025, counsel for Defendant conferred with counsel for Plaintiff, Anthony Paronich, who indicated in writing to Defendant's counsel the same day that Plaintiff does not oppose a thirty (30) day extension of time for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint.

4. The requested extension does not impact any other deadlines in this matter. There is no scheduling order in the case yet, and the parties do not have an appearance scheduled before the Court or any other deadliness set at this time.

5. By seeking this extension, Defendant does not waive, and expressly reserves, all defenses to the Complaint, including jurisdictional defenses or arbitral rights.

For all of the following reasons, Defendant respectfully requests that the Court grant the requested extension, and accordingly enter an order extending Defendant's deadline to answer, move, or otherwise respond to Plaintiff's Complaint to and including August 28, 2025, along with granting Defendant all other relief the Court deems just and proper.

Respectfully submitted,

*/s/ John W. McGuinness*

John W. McGuinness  
Manatt, Phelps & Phillips, LLP

*Counsel for Defendant  
Better Mortgage Corp.*